

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ANNETTE WORLEY,

Plaintiff,

Case No. 11-CV-15268

Hon. Robert Cleland

v

AKB EXPRESS INC., a foreign corporation,
and EMMANUEL G. ADOM,

Defendants.

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STIPULATED PROTECTIVE ORDER PURSUANT TO MCR 2.302(C)

This matter having come before the Court, and the Court being fully advised in
the premises:

IT IS HEREBY ORDERED that:

1. This Protective Order shall govern the production of the following materials:

- a. The name and account number of every banking institution Plaintiff has
had access to since January 2011.
- b. Any and all information regarding Plaintiff's bank accounts maintained
by Plaintiff's banking institutions.
- c. Any and all information obtained pursuant to authorizations directed at
Plaintiff's banking institutions.

2. Protected information will be used only for the purposes of litigation and in compliance with the applicable Michigan Court Rules, including, but not limited to MCR 2.302(C) and the Michigan Rules of Evidence, and will not be disclosed to any individual unrelated to this litigation.
3. The provisions of this Stipulated Protective Order shall not terminate at the final conclusion of this action. Upon termination, either by final judgment after appeal, if any, or by settlement of this litigation, upon request, Defendant's counsel shall return to Plaintiff's counsel all materials and information protected by this order. Counsel shall destroy any and all extracts, summaries and analysis of the information or materials protected by this Order.
4. The attorneys of record are responsible for employing measures to control, consistent with this Stipulated Protective Order, the duplication of, access to and distribution of copies of confidential documents. Parties shall not duplicate any confidential documents except for working copies and/or for filing with the Court under seal.

DATED: September 27, 2012

s/Robert H. Cleland
UNITED STATES DISTRICT COURT JUDGE

Approved as to form and substance:

/s/ Robert M. Raitt
ROBERT M. RAITT P47017

John T. Eads, III
JOHN T. EADS P43825

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